

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:)	
JULIAN A. SIMPSON,)	Case No. 22-20063 GLT
)	
Debtor.)	Chapter 7
)	
JULIAN A. SIMPSON,)	Docket No. 28
)	Related to Docket No.
)	
Movant,)	
)	Hearing Date & Time: 6/23/2022 at
)	10:00 a.m.
)	
vs.)	
)	
ONE MAIN FINANCIAL AND)	
NATALIE LUTZ CARDIELLO,)	
CHAPTER 7 TRUSTEE,)	
Respondents.)	

**DEBTOR'S MOTION TO AVOID A NON-POSSESSORY,
NON-PURCHASE MONEY SECURITY INTEREST**

1. Debtor, Julian A. Simpson, commenced this case on January 12, 2022, by filing a voluntary petition for relief under chapter 7 of Title 11 of the United States Code.

2. On or about March 16, 2021, Debtor at Account No. 3231470xxxxxxxxxxx financed an installment loan through One Main Financial. The remaining balance at the time of the bankruptcy filing is approximately ten thousand three hundred eight-two dollars (\$10,382.00). As security for the loan One Main Financial insisted upon, and Debtor executed, a note and security agreement granting to One Main Financial a security interest in a 2013 Hyundai Sonata that has since been repossessed and a security interest in and on the Debtor's personal property, which was held primarily for the family and household use of the Debtor and her dependents.

3. All such possessions of Debtor has been claimed as fully exempt in her bankruptcy case.

4. The existence of One Mail Financial's lien on Debtor's household and personal goods impairs exemptions to which the Debtor is entitled under 11 U.S.C. § 522(b).

- WHEREFORE, Debtor prays for an Order granting her objection to One Main Financial's claim of maintaining a security interest in the Debtor's household and personal goods.

Respectfully submitted,

Date: 5/25/2022

/s/ Rodney D. Shepherd
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